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Attorneys for Plaintiff MEDIATEK INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

MEDIATEK INC.

Plaintiff,

V.

FREESCALE SEMICONDUCTOR, INC.

Defendant.

**Civil Action No. 4:11-cv-05341 (YGR)
(JSC)**

**STIPULATED REQUEST TO EXTEND
THE DEADLINE FOR CERTAIN
RENEWED ADMINISTRATIVE
MOTIONS FOR LEAVE TO FILE
UNDER SEAL**

Hon. Jacqueline Scott Corley

1 Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, plaintiff MediaTek, Inc. (“MediaTek”)
2 requests that the Court extend from noon, August 23, 2013, until 2:00 p.m. August 26, 2013 the
3 filing deadline for MediaTek’s Renewed Administrative Motions for Leave to File Under Seal
4 (the “Renewed Administrative Motions”), solely for the deposition transcript exhibits related to
5 MediaTek’s and defendant Freescale Semiconductor, Inc.’s (“Freescale”) Joint Letter Briefs
6 Regarding MediaTek’s Third Notice of Rule 30(b)(6) Deposition (Dkt. No. 187) and MediaTek’s
7 Use of Rule 30(b)(6) Deposition Hours (Dkt. No. 195). MediaTek and Freescale stipulate to this
8 request.

9
10 This stipulated request is supported by the following facts:

11
12 ▪ MediaTek filed the two Renewed Administrative Motions—by which MediaTek
13 seeks to protect Freescale’s confidential business information included in the
14 deposition testimony of the filed exhibits—on the first business day following this
15 Court’s noon, August 23, 2013 deadline for renewed administrative motions for leave
16 to file under seal (Dkt. Nos. 187 and 195; Dkt. No. 177);
17
18 ▪ The Renewed Administrative Motions required the review and redaction of 11
19 deposition transcript excerpts and 20 full deposition transcripts to protect information
20 designated by Freescale as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES
21 ONLY” pursuant to the Stipulated Amended Protective Order in effect;
22
23 ▪ Freescale has informed MediaTek that, despite its good-faith efforts, Freescale was
24 unable to provide MediaTek with redacted versions of the exhibits to the parties’
25 Joint Letter Briefs Regarding MediaTek’s Third Notice of Rule 30(b)(6) Deposition
26 and MediaTek’s Use of Rule 30(b)(6) Deposition Hours in time for MediaTek to
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1 meet this Court's noon, August 23, 2013 deadline to file the Renewed Administrative
2 Motions;

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- 4 ▪ Freescale represents that it has filed or will file, in support of this stipulated request,
5 an accompanying sworn declaration describing these good-faith efforts to timely
6 provide redacted versions of the full deposition transcripts and deposition excerpts;
- 7 ▪ The parties agree that good cause exists for the requested one business day extension;
- 8 ▪ The parties conferred regarding this request on August 23, 2013;
- 9 ▪ Pursuant to Civil L.R. 6-2, MediaTek requests that this Court order, by signing below,
10 that the deadline to file the two Renewed Administrative Motions is extended to 2:00
11 p.m., August 26, 2013, and MediaTek and Freescale stipulate to this request.

12 IT IS SO STIPULATED.

13 Dated: August 26, 2013

14 Respectfully submitted,

15 MEDIATEK INC.

16 By its attorneys,

17 */s/ Christopher A. Franklin*

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12 Attorneys for Plaintiff MEDIATEK INC.

13 Dated: August 26, 2013

14 Respectfully submitted,
15 FREESCALE SEMICONDUCTOR, INC.
16 By its attorneys,

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Attorneys for Defendant-Counterclaimant
FREESCALE SEMICONDUCTOR, INC.

1
2 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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5 Date: _____
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28 United States District Court Judge

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